## UNITED STATES DISTRICT COURT DISTRICT OF PUERTO RICO

# UNITED STATES OF AMERICA, **Plaintiff**,

v.

- a. \$1,000,000.00 contained in Charles Shwab & Co., Inc. account #9991-8933, in the name of Donald Keith ELLISON, seized on April 26, 2019;
- b. \$3,425,512.93 contained in Charles Schwab & Co., Inc. account #9991-8933, in the name of Donald Keith ELLISON, seized on April 26, 2019:
- c. One (1) Myco Boat Traiker Vin #1M9BA4031JB817150;
- d. One (1) Caterpillar Model D5K2LGP Tractor, Serial Number KYY01200
- e. One (1) Caterpillar Model 320EL Hydraulic Excavator, Serial Number WBK02864
- f. \$71,55140 contained in checking account number 855356700 at JP Morgan Chase, account in the name of Donald Keith Ellison
- g. \$276,583.84 contained in savings account number 3653269077 at JP Morgan Chase, account in the name of Donald Keith Ellison;
- h. \$100,306.70 contained in saving account number 317222591 at JP Morgan Chase, account is in the name of Keith Ellison and Jakyln F. Garret;
- i. One (1) 2018 Invincible 40-foot catamaran Hull #IVBC0035B818;
- j. One (1) 2018 Ford F-150 "XL" crew cab pickup truck, VIN #1FTEW1E50JFB84787, **Defendants In Rem,**

Civil No: 19-CV-1693 (ADC)

## NOTICE OF PUBLICATION

### TO THE HONORABLE COURT:

COMES NOW, plaintiff, the United States of America, through its undersigned attorneys, and respectfully states:

That on this date, plaintiff is filing with this Court an Advertisement Certification Report, Advertisement Copy, demonstrating that notice was published for thirty (30) consecutive days on www.forfeiture.gov, an official government internet site, as required by Rule G(4)(a)(iv)(C) of the Supplemental Rules for Admiralty and Maritime Claims and Asset Forfeiture Actions.

Notice was published for thirty (30) consecutive days from August 11, 2023, through September 9, 2023, as follows:

- 1) ASSET ID: 19-FBI-003736 \$73,243.43 in funds from Bank Account Number 317222591, in the name of Donald Keith Ellison and Jaklyn Garrett, at JP Morgan Chase Bank in San Antonio, TX Acct# 317222591.
- 2) ASSET ID: 2018 Invincible Catamaran Ser No: IVBC0035B818.
- 3) ASSET ID: 2018 Trailer- Catamaran VIN# 1M9BA4031JB817150.
- 4) ASSET ID: 2018 Ford F-150 XL VIN# 1FTEW1E50JFB84787.
- 5) ASSET ID: Caterpillar Model 320EL Hydraulic Excavator Ser No: WBK02864.
- 6) ASSET ID: Caterpillar Model D5K2LGP Tractor Ser No: KYY01200.

Civil No: 19-CV-1693 (ADC)

7) ASSET ID: \$2,849,817.85 in funds from Bank account Number 9991-8933 in the name of Donald Keith Ellison at Charles Schwab & Co., Inc. Acct# 9991-8933.

In San Juan, Puerto Rico this 17<sup>th</sup> day of October 2023.

W. Stephen Muldrow United States Attorney

S/David O. Martorani-Dale

David O. Martorani-Dale
Assistant U.S. Attorney
USDC No # 226004
Torre Chardón Building, Suite 1201
350 Carlos Chardón Street
Hato Rey, Puerto Rico 00918
Tel. (787) 766-5656; Fax. (787) 771-4050
Email: david.o.martorani@usdoj.gov

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this same date, October 17, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/EMF system.

S/David O. Martorani-Dale
David O. Martorani-Dale
Assistant U.S. Attorney